

1/12/05 - 03596

January 12, 2005

TO: Randy McElveen

FROM: David Lilley

RE: Comments on the Human Health Risk Assessment  
portions of the Draft SWMU 46 RCRA Facility  
Investigation Report, MCB Camp Lejeune, NC  
November 2004

1. Page 6-1, first paragraph: The latest version of RAGS Part D is dated December, 2001. I made this comment in my 6/18/03 comments on the Master Project Plans, RCRA Program. Please use the latest version of RAGS Part D in all human health risk assessments conducted from this point on.
2. Figure 6-1: Please add residents exposure to subsurface soil via the ingestion, dermal, and inhalation exposure routes in order to be consistent with Appendix K, Table 1.
3. As mentioned in my 6/18/03 comments (comment #2), "The maximum concentration (or detection limit, see RAGS Part A, Section 5.3 for guidance) should be used to screen against the Region IX PRGs for detects and nondetects. All screening should take place in RAGS Part D Tables 2.x." All chemicals that were analyzed for should appear in Appendix K, Tables 2.x and either the maximum concentration or the maximum detection limit should be used to screen against the Region IX PRGs and appropriate ARARs.
4. Appendix K, Table 3.4: Although it is not listed on the EPA Region 4 website, more recent guidance, dated August 29, 2002, is provided for the calculation of the groundwater exposure point concentration. The guidance is provided as an attachment to the electronic version of these comments. Please use this guidance for the calculation of the groundwater exposure point concentration in human health risk assessments conducted from this point on.
5. Appendix K, Table 1: I've never seen the future adult trespasser scenario quantified, trespassers are usually considered to be adolescents. In future risk assessments, the trespasser scenario may be adequately represented by the teenage receptor.

6. Appendix K, Table 2.5, footnote 2: Please replace “Target Groundwater Concentration” with “Groundwater Quality Standards”.
7. Please provide the logic by which chemicals were included/excluded in Tables 10.x.